

Application No. 10/737,272

REMARKS

In a Final Office Action dated August 31, 2005, claims 1-3, 5-11, 13-25 were rejected under 35 U.S.C 102(b) as being anticipated by Beroz et al. (U.S. Patent 6,361,959). Applicant respectfully disagrees and submits that Beroz is insufficient to render a *prima facie* case of obviousness with respect to claim 1 because Beroz does not disclose spring tip that has a direction of maximal curvature, the direction of maximal curvature in a plane approximately perpendicular to the lift line. **Applicant respectfully submits that Beroz cannot disclose the limitation because all of the Beroz spring tips (element 38 in the Beroz drawings) are flat.** By definition, without a curvature to the Beroz spring tips, there can be no direction of maximal curvature at the spring tip. However, Applicant, in order to further clarify that the spring tips must be curved have amended claim 1 to specifically call out that the spring tips are "curved spring tips".

Applicant further respectfully submits that it is not obvious to form the spring tips claimed using the Beroz reference. The method of formation of Beroz does not lend itself to forming curved spring tips. As described in the prior Office Action, Beroz describes forming an interconnect by bonding a first end of an interconnect to a first substrate, and a second end of the interconnect to a second substrate and then moving the substrates apart to form the structures illustrated in Beroz. Beroz does not use the methods described in Applicant's specification. Instead, Beroz applies an external force. Because Beroz bonds each end to a substrate, it would not be obvious to one of skill in the art to curve the substrate, or in particular to curve the substrate to which Beroz is bonded such that the direction of maximal curvature is as claimed.

Independent claim 15 of Applicant's application and new independent claim 33 which substantially covers the original scope of the prior claim 1 were rejected under 35 U.S.C. 102(b) as being anticipated by Beroz. In rejecting Applicant's arguments of 8/16/05 as not persuasive, it was argued that Beroz shows an in-plane curve. However, the rejection did not address the issue that the in-plane curve is in a plane approximately parallel to the substrate plane AND that the curve is in the release

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portion of the spring. Examples of the particular embodiment claimed is shown in Figure 8-10 where the curves are in a plane approximately parallel to the substrate plane. The drawing of Figure 5A provided in the final rejection of 8/29/05 shows an anchor formed in the shape of a disk. Applicant respectfully submits that a disk anchor is not equivalent to a curve in the spring. However, even if a bend in a spring could be that broadly defined, Applicant's "in plane curve" is claimed as a curve that is in the release portion of the spring. Figure 5A clearly shows that the disc is in the anchor portion of the spring and not in the release portion.

In the Final Office Action, independent claim 26 was rejected in view of Di Stefano et al. (U.S. Patent 5,859,472). In particular, col. 2, lines 63-65 of DiStefano was cited as disclosing a stress gradient in a stressed metal spring. Col. 2, lines 63-65 merely discuss concentrating stress by concentrated torsion or bending forces, not the stressed metal claimed and described in the specification. Applicant has further clarified stressed metal by claiming the stress gradient that includes a compressive stress in lower spring layers and a tensile stress in upper spring layers. The description is included in page 6, paragraph 30 of the specification, thus no new matter has been added.

All pending claims depend on independent claims 1, 15, 26 or 33. Thus, in view of the preceding amendments and remarks, Applicant respectfully submits that the claim as amended are allowable over the cited prior art reference, and allowance at Examiner's earliest convenience is hereby respectfully requested. In the event that the Examiner believes a teleconference would facilitate prosecution, Applicant respectfully requests that Examiner contact the undersigned.

Respectfully submitted,



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